

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,
Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC., a Delaware
corporation
Defendant.

| Case No. 3:23-cv-03417-VC

STIPULATION AND [PROPOSED] ORDER REGARDING CASE SCHEDULE

Hon. Vince Chhabria

Pursuant to N.D. Cal. Civil Local Rule 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher Farnsworth (collectively, the “Plaintiffs”); and Defendant Meta Platforms, Inc. (“Meta”) (together, the “Parties”), by and through their respective counsel, stipulate to the following:

1. On July 31, 2025, the Parties submitted a joint letter brief regarding outstanding discovery disputes. ECF No. 615. The disputes raised by Plaintiffs concerned Meta’s productions in response to the Court’s “baseball arbitration” discovery order. ECF Nos 470; 467; *see* 07/11/2025 Case Management Conference Hr’g Tr. at 19:13-14 (“if there is a dispute about further discovery, it can go before Judge Hixson”).

1 2. On August 1, 2025, Judge Hixson granted Plaintiffs' motion to compel compliance in part
2 and denied it in part. ECF No. 616. Pursuant to that Order, Meta produced additional responsive documents
3 on August 30.

4 3. On September 2, 2025, the Court issued an Order setting a Case Schedule for expert
5 discovery and summary judgment briefing for the remaining claims in this case. ECF No. 623 (the
6 "Scheduling Order").

7 4. In the process responding to questions from Plaintiffs, Meta discovered additional
8 responsive information (the "New Evidence"). Meta made Plaintiffs aware of this new evidence on
9 September 12, 2025, and it made a production that day. Meta made another production on September 17.
10 Meta continues to investigate and may make additional productions.

11 5. Plaintiffs assert that the New Evidence is relevant to Plaintiffs' expert analysis and report,
12 which is currently due on September 30, 2025. The Parties therefore respectfully seek to modify the
13 Scheduling Order to allow Meta to complete its investigation while also affording Plaintiffs' expert
14 sufficient time to analyze and incorporate the New Evidence into his report.

15 6. In light of this New Evidence, Plaintiffs contend that they are entitled to additional,
16 torrenting-focused fact and Rule 30(b)(6) depositions, and potentially written discovery, and the parties are
17 meeting and conferring regarding those issues.

18 7. In view of the additional time Plaintiffs request for their expert analysis and report related
19 to the New Evidence, and to allow sufficient time for any further discovery that may be warranted, and to
20 brief and resolve existing and potential disputes concerning the scope of any further discovery, the Parties
21 jointly propose an extension of approximately 50 days to the current expert report deadlines in the Schedule
22 Order, and approximately 60 days for the expert deposition and summary judgment briefing deadlines, as
23 follows:

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| Event | Current Scheduling Order (ECF Nos. 623 and 622) | Proposed Deadline |
|--|--|------------------------------|
| Plaintiffs' Expert Report | Tuesday, September 30, 2025 | Friday, November 14, 2025 |
| Meta Rebuttal to Plaintiffs' Expert Report | Thursday, October 30, 2025 | Friday, December 12, 2025 |
| Deadline to Complete Expert Depositions | Monday, November 10, 2025 | Wednesday, December 31, 2025 |
| Summary Judgment Brief 1 | Friday, November 21, 2025 | Friday, January 9, 2026 |
| Summary Judgment Brief 2 | Friday, December 19, 2025 | Friday, February 6, 2026 |
| Summary Judgment Brief 3 | Thursday, January 15, 2026 | Thursday, March 5, 2026 |
| Summary Judgment Brief 4 | Thursday, January 29, 2026 | Thursday, March 19, 2026 |
| Summary Judgment Hearing | Thursday, February 12, 2026 | Thursday, April 2, 2026 |

1 Dated: September 23, 2025

2 By: /s/ Phillip Morton

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20 Respectfully submitted,

21 By: /s/ Maxwell V. Pritt

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27 Counsel for Individual and Representative
Plaintiffs and the Proposed Class

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ *Maxwell V. Pritt*
Maxwell V. Pritt

PROPOSED ORDER

Pursuant to the stipulation of the Parties, the Court grants the Parties' request to amend the Case Schedule.

IT IS SO ORDERED.

DATED: _____

HON. VINCE CHHABRIA
United States District Judge